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PROGRESSIVE SEMICONDUCTOR SOLUTIONS LLC

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION**

PROGRESSIVE SEMICONDUCTOR  
SOLUTIONS LLC,

Plaintiff,

vs.

QUALCOMM TECHNOLOGIES,  
INC.

Defendant.

Case No.: 8:13-cv-1535 ODW (JEMx)

**SUPPLEMENTAL DECLARATION OF  
DAVID A. SKEELS IN SUPPORT OF  
PLAINTIFF'S REPLY IN SUPPORT  
OF MOTION TO MODIFY  
SCHEDULING ORDER AND FOR  
LEAVE TO AMEND**

I, David A. Skeels, hereby declare as follows:

1. I am an attorney with the firm of Friedman, Suder & Cooke, counsel for Plaintiff Progressive Semiconductor Solutions LLC ("PSS"). I am competent to testify as to the matters stated herein, and, unless indicated otherwise, I have personal knowledge of the matters stated herein.


1           2.       I submit this sworn supplemental declaration to correct one fact  
2 recited in Plaintiff's Reply in Support of Motion to Modify Scheduling Order and  
3 for Leave to Amend (Dkt. 59) and in the supporting declaration (Dkt. 60)  
4 (collectively, "Reply").

5           3.       The Reply accurately stated that Plaintiff circulated a draft joint status  
6 report on December 27, 2013. *See, e.g.*, Dkt. 60 at ¶ 3. However, the Reply also  
7 stated that Plaintiff did not receive any feedback from Defendants until January 24,  
8 2014. In fact, Defendants provided feedback on January 10, 2014. This fact does  
9 not materially change the substance of Plaintiff's arguments.

10          4.       Nevertheless, Plaintiff felt compelled to correct the record as soon as  
11 Defendants called the issue to Plaintiff's attention. Defendants did so yesterday  
12 afternoon, June 6, 2014, when they called Plaintiff and forwarded an email dated  
13 June 10, 2014 – an email Plaintiff had not located during its preparation of the  
14 Reply. During yesterday's phone call, Defendants also raised a host of other issues  
15 and complaints relating to the Reply. Those other complaints are without merit.

16  
17           I declare under penalty of perjury that the foregoing is true and correct.  
18 Executed June 6, 2014 in Fort Worth, Texas.

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DAVID A. SKEELS